

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
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UNITED STATES OF AMERICA,

Plaintiff,

v.

PRAGNESHBHAI M. PATEL,  
a/k/a Pragnesh Patel,  
a/k/a Master,  
EVERETTE JHAMAL THIBOU,  
JAYESH J. PANCHAL,  
a/k/a Jack,  
VIJAYA C. SHETTY,  
JMYLA ELAINE SHA'TARIA WHITE,  
JORREL TYLER JACKSON, and  
MCKHAELA KATELYNN MCNAMARA,

**INDICTMENT**

Defendants.

\_\_\_\_\_/

The Grand Jury charges:

**(Conspiracy to Commit Wire Fraud)**

From a date unknown to the Grand Jury but beginning in at least July 2020 and continuing up to and including August 2022, in the Western District of Michigan and elsewhere, the defendants,

**PRAGNESHBHAI M. PATEL,  
a/k/a Pragnesh Patel,  
a/k/a Master,  
EVERETTE JHAMAL THIBOU,  
JAYESH J. PANCHAL,  
a/k/a Jack,  
VIJAYA C. SHETTY,  
JMYLA ELAINE SHA'TARIA WHITE,  
JORREL TYLER JACKSON, and  
MCKHAELA KATELYNN MCNAMARA,**

knowingly combined, conspired, confederated, and agreed with each other and others known and

unknown to the Grand Jury, to commit the offense of wire fraud, in violation of Title 18, United States Code, Sections 1349 and 1343.

**OBJECT, MEANS, AND METHODS**

1. The object of the conspiracy was for the defendants and other members of the conspiracy to enrich themselves by defrauding vulnerable victims in the Western District of Michigan and elsewhere in the United States, most of whom were elderly. The conspiracy resulted in the fraudulent receipt of more than \$11 million from approximately 50 victims.

2. It was part of the conspiracy that members of the conspiracy located in India contacted victims in the United States through unsolicited computer pop-ups, emails, or telephone calls using wire communications in interstate and foreign commerce.

3. It was further part of the conspiracy that, after the initial contact was made, the conspirators in India followed up with the victims by telephone, typically by using voice-over-internet-protocol (VOIP) technology to make it appear that the telephone calls originated from area codes within the United States.

4. After the initial contacts were made, the conspirators executing the scheme to defraud used a variety of methods and materially false and fraudulent pretenses, representations, and promises to convince victims to give money to members of the conspiracy. In one version, victims were falsely told that their bank accounts had been compromised and they needed to withdraw all of their cash and turn it over to fake “federal agents” for safekeeping. In another version, victims were falsely informed that their computers had been infected by a virus and they needed to pay for technical support. In a third version, victims were falsely informed that they had been identified in a criminal investigation and needed to turn over money to clear their names. The conspiracy also used various other methods to defraud victims.

5. Using these methods, members of the conspiracy defrauded victims and convinced them to send money to the conspirators through wire transfers, checks, gift cards or other types of stored value cards, or to withdraw money and send it to members of the conspiracy through the mail or hand it over to members of the conspiracy during in-person meetings.

6. The defendants played a number of different roles in furtherance of the conspiracy and were paid for their participation in the conspiracy.

7. “Runners” acted as money mules who collected or received fraud proceeds. JORREL TYLER JACKSON, JMYLA ELAINE SHA’TARIA WHITE, and MCKHAELA KATELYNN MCNAMARA acted as runners in furtherance of the conspiracy. JACKSON and WHITE also recruited other individuals to join the conspiracy.

8. EVERETTE JHAMAL THIBOU recruited runners to participate in the conspiracy, directed runners where to go to receive fraud proceeds, arranged and supervised the runners’ interactions with victims as directed by the conspirators in India, arranged travel for the runners, and arranged for the deposit of fraud proceeds in various bank accounts.

9. JAYESH J. PANCHAL, a/k/a Jack, and VIJAYA C. SHETTY acted as drivers who transported the runners throughout the United States to collect fraud proceeds from victims. PANCHAL and SHETTY then distributed the fraud proceeds to PRAGNESH BHAI M. PATEL, a/k/a Pragnesh Patel, a/k/a Master, and other members of the conspiracy.

10. Once fraud proceeds were collected or received from victims, PRAGNESH BHAI M. PATEL, a/k/a Pragnesh Patel, a/k/a Master, distributed the proceeds as directed by the conspirators in India.

11. It was further part of the conspiracy that the defendants or their co-conspirators transmitted or caused to be transmitted wire communications in interstate and foreign commerce

for the purpose of executing the scheme, including emails, text messages, phone calls, transfers of money over wire, and use of the internet.

**VICTIM J.K.**

12. From in or about October 2021 through in or about December 2021, the defendants and other conspirators defrauded victim J.K., a 70-year-old resident of Lake County, Michigan, of approximately \$398,000. In furtherance of this conspiracy, one or more of the conspirators transmitted or caused to be transmitted wire communications in interstate or foreign commerce to Lake County, in the Western District of Michigan.

13. In or about October 2021, victim J.K. received an alert on her computer that told her she had a computer virus. The alert directed her to call a phone number. When victim J.K. called that phone number, a co-conspirator falsely represented himself as “Roy D’Souva,” the manager of Fifth Third Bank’s fraud department. He falsely represented that there had been a breach of J.K.’s Fifth Third Bank Account. The co-conspirator further misrepresented that there was a “federal investigation” into the matter. The co-conspirator further misrepresented that, in order to safeguard her funds, J.K. had to withdraw all the money from all of her bank accounts and provide it to federal agents.

14. On or about October 13, 2021, the co-conspirator instructed J.K. to withdraw as much cash as she could from her bank accounts and place the cash in a small box. He further instructed her to drive to a Family Dollar in Lake County, Michigan, and give the cash to an “undercover federal agent” for safekeeping. The co-conspirator also provided J.K. a pass code and instructed J.K. to give the money to the “federal agent” after the agent gave her the pass code.

15. A photograph dated October 13, 2021, recovered from the phone of PRAGNESH BHAI M. PATEL, a/k/a Pragnesh Patel, a/k/a, Master, showed victim J.K.’s home

address.

16. On or about October 14, 2021, EVERETTE JHAMAL THIBOU sent MCKHAELA KATELYNN MCNAMARA a text message with victim J.K.'s home address and asked how far it was from MCNAMARA's home to J.K.'s home address. MCNAMARA responded, "I'm two hours and 45 minutes from that address." Later that day, MCNAMARA sent THIBOU a text message saying, "We're heading there now." THIBOU responded, "it's just a person-to-person transaction."

17. On or about October 14, 2021, MCNAMARA and JAYESH J. PANCHAL, a/k/a Jack, travelled to the Family Dollar in Lake County, Michigan where MCNAMARA met with victim J.K. MCNAMARA identified herself as "Oliver Davis," and gave J.K. the pass code. J.K. then gave MCNAMARA a box containing \$30,000 in cash.

18. On or about October 15, 2021, MCNAMARA sent THIBOU a text message asking, "Do you know if I'm going to the same place as yesterday." THIBOU responded, "The same place."

19. On or about October 15, 2021, MCNAMARA and PANCHAL travelled to a restaurant in Lake County, Michigan where MCNAMARA met with victim J.K. and gave her the pass code. J.K. then gave MCNAMARA a box containing \$44,000 in cash.

20. On or about October 15, 2021, THIBOU sent MCNAMARA a text message that said, "How things going." MCNAMARA responded, "We just got here." THIBOU responded, "Let me know when you get done." Later MCNAMARA sent a text to THIBOU stating, "I'm done." THIBOU asked, "He paid you yet." MCNAMARA responded "No he hasn't paid me yet but I still have the package at my feet."

21. On or about October 24, 2021, MCNAMARA and PANCHAL travelled to a store

in Lake County, Michigan where MCNAMARA met with victim J.K. J.K. gave MCNAMARA a box containing \$80,000 in cash. Later that day, MCNAMARA sent THIBOU a text message that said, “Just got done.”

22. On or about November 2, 2021, MCNAMARA and PANCHAL travelled to a store in Manistee County, Michigan where MCNAMARA met with victim J.K. J.K. gave MCNAMARA a box containing \$80,000 in cash.

23. On or about November 2, 2021, THIBOU sent MCNAMARA a text message asking, “You done the Michigan move.” MCNAMARA responded, “Yup just got done heading to Wisconsin now.”

24. On or about November 17, 2021, MCNAMARA and PANCHAL travelled to a store in Lake County, Michigan where MCNAMARA met with victim J.K. J.K. gave MCNAMARA a box containing \$120,000 in cash.

25. On or about November 17, 2021, MCNAMARA sent THIBOU a text message that said, “I’m done. Heading home now.”

26. On November 21, 2021, MCNAMARA sent THIBOU a screen shot of a text message she had received that said, “ur [You are] doing some fraud ass shit with MY HOMEBOY tho... ur [You are] stupid this man ... doing fraud then u be his lil puppet I hope u know they will catch up to this bs and when u get in some bs don’t call me...”

27. On or about December 2, 2021, MCNAMARA and PANCHAL travelled to a store in Lake County, Michigan where MCNAMARA met with victim J.K. J.K. gave MCNAMARA a box containing \$44,000 in cash.

28. On or about December 2, 2021, THIBOU sent MCNAMARA a text message that said, “You with Jack. You did it already.” MCNAMARA responded, “Done.”

29. On December 2, 2021, VIJAYA C. SHETTY flew from New York City, New York, to Detroit, Michigan, where he met with PANCHAL, who had traveled to Detroit with MCNAMARA following the final meeting with victim J.K.

**VICTIM N.P.**

30. From in or about October 15, 2021, through in or about December 15, 2021, the defendants and other conspirators defrauded victim N.P., a 69-year-old resident of North Carolina, of approximately \$147,000.

31. In or about October 2021, N.P. received a computer pop-up that said her computer had been compromised. The pop-up directed N.P. to call a phone number. N.P. called that phone number and a co-conspirator instructed N.P. to call Bank of America, where N.P. had an account. The co-conspirator provided N.P. with a phone number to call that was not actually affiliated with Bank of America. When N.P. called that phone number, a co-conspirator falsely told N.P. he saw suspicious activity on her account. The co-conspirator further misrepresented that, in order to safeguard the money in her bank account, N.P. had to wire money from her bank account to an account held by the “Federal Trade Commission.”

32. At the direction of a co-conspirator, N.P. wired \$14,500 from her bank account on or about October 18, 2021, to another co-conspirator.

33. At the direction of a co-conspirator, N.P. wired \$9,100 from her bank account on or about October 19, 2021, to an account held by EVERETTE JHAMAL THIBOU. Bank records show that THIBOU attempted to transfer the money out of that account, but it was frozen for suspicious activity.

34. At the direction of a co-conspirator, N.P. withdrew \$9,100 in cash from her bank account on or about October 28, 2021, and shipped it by Federal Express to a Walgreens in Florida.

Walgreens and other retail locations such as Advance Auto Parts Stores provide Federal Express and United Parcel Service (UPS) package drop off and pick up services.

35. At the direction of a co-conspirator, N.P. withdrew \$22,000 in cash from her bank account on or about November 2, 2021, and shipped it by UPS to an Advance Auto Parts Store in Florida.

36. On November 10, 2021, THIBOU sent text messages and screenshots to JMYLA ELAINE SHA'TARIA WHITE with the address and reservation code of an Airbnb located at xxxx Webber Street, Sarasota, Florida, for the period of November 11 to November 14, 2021, in the name of Tanika Erwin. JMYLA WHITE sent a text message to THIBOU that said, "My name really had to be Tanika."

37. At the direction of a co-conspirator, N.P. withdrew \$20,000 in cash from her bank account and shipped it on or about November 12, 2021, to the Airbnb address at xxxx Webber Street, Sarasota, Florida.

38. On or about December 9, 2021, N.P. withdrew \$35,000 in cash from her bank account and travelled to a restaurant in Charlotte, North Carolina, where she handed the cash to a black male in the parking lot. Cellular tower data showed that THIBOU and JORREL TYLER JACKSON were in the vicinity of the meeting location on December 9, 2021.

39. Between October 23, 2021, and December 15, 2021, co-conspirators directed N.P. to withdraw approximately \$37,500 in cash and load it on gift cards. At the co-conspirators' direction, N.P. provided them with the access numbers for the gift cards so that they could access the \$37,500 in funds she loaded on the cards.

40. In or about December 2021, N.P. realized she had been defrauded and reported the fraud to the Charlotte-Mecklenburg police department. Co-conspirators continued to direct N.P.



to ship them money. In or about January 2022, co-conspirators directed N.P. to ship a package of cash to a CVS Pharmacy in Pasco County, Florida. In coordination with the Charlotte-Mecklenburg police department, N.P. shipped a box without including the currency to the address as directed by the co-conspirators.

41. On or about January 6, 2022, JMYLA ELAINE SHA'TARIA WHITE travelled to the CVS Pharmacy in Pasco County, Florida where she retrieved the box mailed by victim N.P. WHITE was stopped by the Pasco County Sheriff's Department, advised by them that the package she picked up had been mailed as part of a fraud scheme, and signed a written acknowledgment that she understood this fact. Despite this warning and acknowledgment, WHITE continued to participate in the fraud conspiracy.

**VICTIM J.R.**

42. As part of the conspiracy, on or about February 17, 2022, victim J.R. shipped a package containing \$40,000 via the United Parcel Service to an Advance Auto Parts store located at 1705 Holloway Street, Durham, North Carolina. Text messages and Airbnb records show JMYLA WHITE, and co-conspirators were staying in the Raleigh-Durham area of North Carolina between February 15, 2022, and February 18, 2022. On or about February 18, 2022, JMYLA WHITE picked up or caused a co-conspirator to pick up the package containing \$40,000 in fraud proceeds from victim J.R. at the Advance Auto Parts store located at 1705 Holloway Street, Durham, North Carolina. Cell tower records show JMYLA WHITE and a co-conspirator in the vicinity of 1705 Holloway Street, Durham, North Carolina on February 18, 2022.

43. On or about February 19, 2022, JMYLA WHITE sent a text message to THIBOU, stating "it's was \$40k in the box yesterday."

**VICTIM P.D.**

44. From in or about November 2021, through on or about February 2, 2022, the defendants and other conspirators defrauded victim P.D., a 66-year-old resident of California, of approximately \$475,000.

45. In or about late November 2021, P.D. received a pop-up on a computer warning her of a computer virus. That pop-up directed her to call a 1-866 phone number. When P.D. called the phone number she spoke to a co-conspirator who identified himself as “Roy DeSousa” and falsely informed her that she was a victim of identity theft, that her Social Security Number had been compromised, that illegal gambling activity appeared on her bank account, and that the Federal Trade Commission was investigating the matter. The co-conspirator further instructed P.D. to withdraw cash from her bank accounts so it could not be used against her in the fictitious investigation.

46. At the direction of co-conspirators, P.D. shipped a package of cash on or about December 9, 2021, to a Walgreen Pharmacy in Waycross, Georgia. Cellular tower records show that JMYLA WHITE and PRAGNESH BHAI M. PATEL were in the vicinity of the Walgreen Pharmacy in Waycross, Georgia on or about December 10, 2021. On or about December 8, 2021, THIBOU sent JMYLA WHITE a text message with the address for an Airbnb in Waycross, Georgia. On or about December 9, 2021, JMYLA WHITE sent THIBOU a text message seeking check-in information for the Airbnb in Waycross, Georgia. Records show that the Airbnb was rented in JMYLA WHITE’s name from on or about December 9, 2021, through on or about December 11, 2021.

47. At the direction of conspirators, on or about December 17, 2021, P.D. met a black male in the parking lot of a grocery store in Auburn, California and handed him a box of \$50,000 in cash.

48. THIBOU and JORREL JACKSON travelled by plane from Tampa, Florida to Auburn, California on or about December 17, 2021. On or about December 17, 2021, THIBOU sent JACKSON text messages with P.D.'s name, vehicle registration and description, clothing description, and the address of the grocery store where the meeting with P.D. took place. THIBOU also provided JACKSON with a pass code and the name of "Oliver Davis," the same name used in the fraud against victim J.K.

49. At the direction of co-conspirators, P.D. met the same black male later on December 17, 2021, at a different address in Auburn, California, and handed him a box containing \$20,000 in cash.

50. On or about December 18, 2021, THIBOU and JMYLA WHITE exchanged text messages referencing the \$70,000 obtained from victim P.D. on that date.

51. At the direction of co-conspirators, P.D. met a member of the conspiracy on or about January 6, 2022, and handed over a box of cash. JAYESH J. PANCHAL drove the co-conspirator to the meeting location.

52. At the direction of co-conspirators, P.D. met a member of the conspiracy on or about January 15, 2022, and handed over a box of cash to a co-conspirator. VIJAYA SHETTY drove the co-conspirator to the meeting. On or about January 15, 2022, VIJAYA SHETTY deposited \$21,000 in fraud proceeds into his business bank account.

53. At the direction of co-conspirators, P.D. met a member of the conspiracy on or about January 21, 2022, and handed over a box of cash to a co-conspirator. VIJAYA SHETTY drove the co-conspirator to the meeting with P.D.

**VICTIM R.T.**

54. From in or about February 2022, through on or about August 2022, the defendants

and other conspirators defrauded victim R.T., a 78-year-old resident of Wyoming, of approximately \$3.5 million.

55. In or about February 2022, co-conspirators led R.T. to believe that his computer had been hacked and money was missing from his bank accounts. R.T. was directed to contact a fictitious “Microsoft” employee. The co-conspirator further misrepresented that, in order to safeguard the money in his bank accounts, R.T. had to wire money from the accounts to “secure accounts” maintained by the co-conspirators. At the direction of co-conspirators, R.T. subsequently wired approximately \$3.5 million in numerous separate wire transactions.

56. At the direction of co-conspirators, on or about February 14, 2022, R.T. wired \$44,993.82 to a Navy Federal Credit Union account in the name of JORREL JACKSON. On the same day, THIBOU sent a text message with the Navy Federal Credit Union account number to a phone number with an Indian country code.

57. Between on or about February 14, 2022, and February 16, 2022, THIBOU and an Indian co-conspirator exchanged text messages regarding the wire transfer from victim R.T., including a screenshot of R.T.’s computer, his name, address, and phone number.

#### **VICTIM P.M.**

58. In or about August 2020, victim P.M., a 75-year-old resident of California, received a call that his computer virus protection was about to expire and needed to be renewed. P.M. spoke with a co-conspirator who told him there was a \$200 rebate available for the virus protection software. The co-conspirator subsequently falsely represented that he accidentally provided P.M. a \$20,000 rebate instead of the \$200 rebate.

59. To make up the difference in the excess rebate money, the co-conspirator directed P.M. to obtain \$5,000 in gift cards and provide the numbers to the co-conspirator. The co-

conspirator further directed P.M. to withdraw \$14,500 in cash, place the money inside the pages of two hardcover books, and ship the books with the cash to an address in Woodbury, New Jersey.

60. On or about August 28, 2020, PRAGNESHBHAI M. PATEL took a video of himself opening P.M.'s package and counting approximately \$14,500 in cash hidden inside the hardcover books.

**18 U.S.C. § 1349**

**18 U.S.C. § 1343**

**FORFEITURE ALLEGATION**  
**(Conspiracy to Commit Wire Fraud)**

The allegations contained above in the charge alleging Conspiracy to Commit Wire Fraud are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of the violations of 18 U.S.C. §§ 1349 and 1343 set forth in Count 1 of this Indictment, the defendants,

**PRAGNESH BHAI M. PATEL,**  
**a/k/a Pragnesh Patel,**  
**a/k/a Master,**  
**EVERETTE JHAMAL THIBOU,**  
**JAYESH J. PANCHAL,**  
**a/k/a Jack,**  
**VIJAYA C. SHETTY,**  
**JMYLA ELAINE SHA'TARIA WHITE,**  
**JORREL TYLER JACKSON, and**  
**MCKHAELA KATELYNN MCNAMARA,**

shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the violation. The property to be forfeited includes, but is not limited to, the following:

1. MONEY JUDGMENT: A sum of money equal to at least \$11,484,894, which constitutes or is derived from proceeds traceable to the offense charged in the Indictment;

2. PERSONAL PROPERTY:

- a. \$82,743 U.S. currency (comprised of \$76,650 U.S. currency (22-DEA-689260, 23-FBI-000308) and \$6,093 U.S. currency (22-DEA-689258, 23-FBI-000309)) seized by the Tennessee Highway Patrol on or about March 7, 2022, during a traffic stop in the Eastern District of Tennessee;

- b. \$3,000 U.S. currency seized on or about December 26, 2022, from a residence on Linden Boulevard in Hicksville, New York (23-FBI-001690);
- c. \$4,146.41 in funds seized on or about February 1, 2023, by the FBI from Trax Credit Union account ending 4110 (23-FBI-002367);
- d. \$196,350 in funds seized on or about May 5, 2023, by the FBI from Wells Fargo Bank NA account ending 9944 (23-FBI-004845);
- e. \$30,000 in funds seized on or about May 5, 2023, by the FBI from JP Morgan Chase & Co. account ending 1165 (23-FBI-004979) and
- f. Approximately \$45,000 in U.S. currency seized on or about July 17, 2023, by the FBI from G.C.

3. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21

U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)

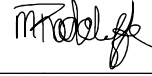
28 U.S.C. § 2461(c)

21 U.S.C. § 853(p)

18 U.S.C. § 1349

18 U.S.C. § 1343

A TRUE BILL



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GRAND JURY FOREPERSON

MARK A. TOTTEN  
United States Attorney



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CLAY STIFFLER  
Assistant United States Attorney